

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Revision of the Commission's Rules	)	CC Docket 94-102
To Ensure Compatibility with Enhanced	)	
911 Emergency Calling Systems	)	

Digital wireless TTY compatibility

REPLY OF NENA,  
APCO and NASNA

On September 26, 2002, NENA, APCO and NASNA opposed the relief sought on reconsideration by Petitioners Illinois Valley Cellular RSA 2 Partnerships, *et al.* After discussion with counsel for Petitioners, we now understand that they intend to complete TTY-compatible digital overlays (GSM or CDMA) to all their TDMA systems on or before the waiver deadline of December 31, 2003. If this overlay deadline is missed for any system, the legacy TDMA network will be made TTY-compatible within the 12/31/03 deadline.

Based on our new understanding -- and assuming that the Americans with Disabilities Act and Section 255 of the Communications Act allow a non-compatible TDMA legacy system to remain in operation if compatibility is available in an overlay network -- we would not object

to Petitioners' request. However, we believe that any grant should be conditioned on adequate notice to hearing-disabled persons that the TDMA network is not TTY-compatible.

Respectfully submitted,

NENA, APCO AND NASNA

By \_\_\_\_\_  
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October 11, 2002

**CERTIFICATE OF SERVICE**

The foregoing "Reply of NENA, APCO and NASNA" was served by regular and electronic mail today upon counsel for Petitioners:

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October 11, 2002

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